

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Draft Title V, No. V-99-005
American Sunroof Company
Bowling Green, KY 42101
May 3, 2000
Ralph Gouge-Reviewer

Source Description:

This facility manufactures fiberglass automobile tops for the car manufacturing industry. This source is major for volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

Type of control and efficiencies:

There will not be any VOC/HAP's control devices associated with any of the different processes or any of the other operations at this facility.

PM emissions at emission point 02, the prime and color/clear booths, will utilize a 90% efficient dry filtered down draft exhaust system.

Emission factors and their sources:

Emissions from the resin transfer molding operation, and the painting booths were determined by engineering estimates and emission factors from AP-42.

Emissions for the natural gas-fired devices were taken from AP-42.

Applicable regulation(s):

Regulation 59:010, New process operations, applies to the PM emissions from the painting booths at emission point 02. It is possible, though unlikely, that due to control equipment failure the particulate matter hourly allowable may be exceeded. Regular maintenance and filter changing will be performed in order to maintain the minimum acceptable control efficiency. Record keeping will be kept to help insure that compliance will be achieved and maintained with the allowables at these affected facilities.

Regulation 401 KAR 63:060, List of hazardous air pollutants, petitions process, lesser quantity designations, and source category list, applies to the various HAP's emissions.

Regulations that are not applicable:

The direct fire natural gas units are not subject to any regulations at this time.

There is not a federal MACT which applies to this source.

The boiler at emission point 01, Resin Transfer Molding, is considered an Insignificant Activity.

Credible Evidence:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52 Section 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.